



**Service of Process
Transmittal**

01/30/2019

CT Log Number 534828232

TO: Donna Gaudet, Incoming Legal Supervisor
Cigna Holding Company
900 Cottage Grove Rd, C38
Bloomfield, CT 06002-2920

RE: Process Served in Mississippi

FOR: Life Insurance Company of North America (Domestic State: PA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: DAVID STREET, Pltf. vs. CIGNA GROUP INSURANCE, et al., Dfts. // To: LIFE INSURANCE COMPANY OF NORTH AMERICA
Name discrepancy noted.

DOCUMENT(S) SERVED: Letter, Summons, Complaint

COURT/AGENCY: Madison County Circuit Court, MS
Case # CI20190026JE

NATURE OF ACTION: Insurance Litigation

ON WHOM PROCESS WAS SERVED: C T Corporation System, Flowood, MS

DATE AND HOUR OF SERVICE: By Certified Mail on 01/30/2019 postmarked on 01/28/2019

JURISDICTION SERVED : Mississippi

APPEARANCE OR ANSWER DUE: Within 30 days from the date of service

ATTORNEY(S) / SENDER(S): PENNY B. LAWSON
VARNER, PARKER & SESSUMS, P.A.
1110 Jackson Street
Vicksburg, MS 39183
601-638-8741

ACTION ITEMS: CT has retained the current log, Retain Date: 01/30/2019, Expected Purge Date: 02/04/2019

Image SOP

Email Notification, Incoming Legal LegalandPublicAffairs-IncomingLegal@cigna.com

SIGNED: C T Corporation System
ADDRESS: 645 Lakeland East Drive
Suite 101
Flowood, MS 39232
TELEPHONE: 214-932-3601

Page 1 of 1 / SS

Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

MISSISSIPPI

INSURANCE DEPARTMENT

P.O. BOX 79

JACKSON, MISSISSIPPI 39205-0079

CERTIFIED MAIL



91 7199 9991 7033 1682 2518



U.S. POSTAGE



ZIP 39201 \$005.75⁰

02 4W

0000347547 JAN 28 2019

Life Insurance Company of NA
c/o CT Corporation System of MS
645 Lakeland East Drive, Ste 101
Flowood, MS 39232

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

3523239099 R021

Exhibit A





MISSISSIPPI INSURANCE DEPARTMENT

MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

501 N. WEST STREET, SUITE 1001
WOOLFOLK BUILDING
JACKSON, MISSISSIPPI 39201
www.mld.ms.gov

J. MARK HAIRE
Deputy Commissioner of Insurance

MAILING ADDRESS
Post Office Box 79
Jackson, Mississippi 39205-0079
TELEPHONE: (601) 359-3569
FAX: (601) 359-2474
WATS: 1-800-562-2957 (Incoming-USA)

January 28, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
91 7199 9991 7033 1682 2518

Life Insurance Company of NA
c/o CT Corporation System of MS
645 Lakeland East Drive, Ste 101
Flowood, MS 39232

In Re: Case No. CI 2019-0026-JE, David Street vs. Cigna Group Insurance, Life Insurance Company of North America, Connecticut General Life Insurance Company and Cigna Life Insurance of New York, in the Circuit Court of Marion County, Mississippi

Dear Sir or Madam:

We enclose a copy of the Summons and Complaint in the above-styled cause which has been received in the Commissioner of Insurance's Office on January 28, 2019 at 10:30 a.m.

Respectfully,

MIKE CHANEY
COMMISSIONER OF INSURANCE

BY Christy Parker
Christy Parker
Assistant to Deputy Commissioner

MC/cp
Enclosures
Pc: Anita Wray
P.O. Box 1626
Canton, MS 39046

Receipt #896455
\$100.00 1/28/19
lc

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

DAVID STREET

PLAINTIFF

VS.

CAUSE NO. GT 2019-0026-JE

CIGNA GROUP INSURANCE,
LIFE INSURANCE COMPANY OF
NORTH AMERICA, CONNECTICUT
GENERAL LIFE INSURANCE COMPANY
AND CIGNA LIFE INSURANCE OF NEW YORK,
AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

TO: Mike Chaney, Commission of Insurance
Mississippi Insurance Department
1001 Woolfolk State Office Building
501 North West Street
Jackson, Mississippi 39201

NOTICE TO DEFENDANT

**THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT
AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.**

You are required to mail or hand-deliver a copy of a written response to the Complaint to the following attorney for the Plaintiff: **PENNY B. LAWSON, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson Street, Vicksburg, Mississippi, 39183, (601) 638-8741.**

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a judgment of default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time afterwards.

Issued under my hand and seal of this court this the 25 day of JAN, 2019.



ANITA WRAY, CLERK
MADISON COUNTY CIRCUIT COURT
MADISON COUNTY, MISSISSIPPI

BY: [Signature] D.C.

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

DAVID STREET

FILED
MADISON COUNTY

PLAINTIFF

VS.

JAN 25 2019

CAUSE NO. _____

CIGNA GROUP INSURANCE,
LIFE INSURANCE COMPANY OF _____ D.C.
NORTH AMERICA, CONNECTICUT
GENERAL LIFE INSURANCE COMPANY
AND CIGNA LIFE INSURANCE OF NEW YORK,
AND JOHN DOES 1-10

ANITA WRAY, CIRCUIT CLERK

DEFENDANTS

COMPLAINT

COMES NOW Plaintiff, David Street, by and through counsel and files this his Complaint against Defendant showing unto the Court as follows:

Parties

1. Plaintiff is an adult resident citizen of Madison County, Mississippi.
2. Defendants, Cigna Group Insurance, Life Insurance Company of North America, Connecticut General Life Insurance Company and Cigna Life Insurance of New York, (hereinafter "Cigna"), is an insurance company licensed to do and doing business in the State of Mississippi where it may be served with process by service upon Mike Chaney, Mississippi Insurance Commissioner, or at such other places and upon such other persons as is allowed by law.

Jurisdiction and Venue

3. This Court has jurisdiction of this action under Miss. Const. Art. 6, §156, and Miss. Code Ann. §§ 9-7-81 and 83-5-3. This Court has personal jurisdiction over Cigna Group Insurance, pursuant to Miss. Code Ann. § 83-21-1. Further, pursuant to Miss. Code Ann. § 13-3-57, Cigna's individual conduct and connections with the State of Mississippi are such that it anticipated or should have reasonably anticipated being haled into the courts of the State of Mississippi insofar

as the sale of its Insurance policies arose as a direct result of its activities to market its insurance products in Mississippi. Assertion of this Court's jurisdiction over Cigna does not offend due process concerns under the Fourteenth Amendment to the United States Constitution.

4. Venue is proper in the Madison County, Mississippi pursuant to Miss. Code Ann, §11-11-3.

Facts

5. That Plaintiff purchased short-term and long-term disability policies from Cigna, through his employer which was administered by Life Insurance Company of North America.

6. Plaintiff began experiencing significant debilitating medical issues with his neck and back, and carpal tunnel syndrome and was unable to perform many of his job duties.

7. On August 18, 2017, Dr. Matthew VanLandingham diagnosed the Plaintiff with severe right lower extremity radiculopathy.

8. On October 2, 2017, Plaintiff filed a claim for disability benefits due to his inability to work, which was denied.

9. On November 29, 2017, Dr. Chris Etheridge, a treating physician, sent a disability management solutions medical request, stating that he could no longer work as of November 29, 2017, still no benefits were paid under either policy.

10. On December 12, 2017, Dr. Alice Messer also sent a disability management solutions medical request, noting that Mr. Street was off work and could not return to work at that time, still no benefits were paid under either policy.

11. On December 13, 2017, Dr. Richard Waddell, also a treating physician, submitted a disability management solutions medical request form as well, stating the Mr. Street could not work at that time.

12. During the time that Cigna was denying Mr. Street's claim, he had applied for disability and the Mississippi Department of Health and Human Services determine that he was in fact, disabled, giving him a disability date of September 29, 2017.

13. After still no response from Cigna, counsel for Mr. Street obtained residual functional capacity questionnaires from his physicians Dr. Alice Messer and Dr. Chris Etheridge, clearly documenting his inability to perform his job duties and unable to return to work.

14. Despite the above and forgoing, Cigna has no arguable basis in which to deny Mr. Street his benefits which are due and owing under his disability policies.

Count 1: Declaratory Judgment

15. All preceding paragraphs are incorporated herein.

16. Cigna's denial of and delay in payment of Policy benefits to Mr. Street were in violation of express terms of the Policy and applicable law. The Policy was in full force and effect through the date of Mr. Street's injury and all rights, claims and benefits accruing to him under the Policy were due and payable.

17. Mr. Street seeks a determination of the rights and responsibilities Cigna owed under the Policies and applicable law.

Count 2: Breach of Contract

18. All preceding paragraphs are incorporated herein.

19. Cigna had no authority, contractual or otherwise, to deny or delay payment of benefits due under the Policies.

20. By denying and delaying payment of benefits due under the Policies when Policy premiums were paid and the Policies were in full force and effect, Cigna breached its contractual obligations to Mr. Street.

21. By denying and delaying payment of valid claims under the Policies, Cigna breached its contractual obligations to Mr. Street.

22. Cigna's breaches of contract caused Mr. Street damages, including, but not limited to, losses sustained as a result of its denial and delay of payment.

23. As a result of Cigna's contractual breaches, it is liable to Mr. Street for all sums due under the Policies and other sums recoverable under applicable law.

Count 3: Tortious Breach or Contract

24. All preceding paragraphs are incorporated herein.

25. Cigna's breaches of contract were attended with intent, gross negligence and recklessness, thereby warranting an award of punitive damages.

Count 4: Breach or Covenant or Good Faith and Fair Dealing

26. All preceding paragraphs are incorporated herein.

27. Cigna is subject to the implied duty in the Policies to act fairly and in good faith so as not to deprive its insured of the rights, claims and benefits accruing to him under the Policies.

28. Cigna's intentional denial and persistent refusal to pay, and delay in the payment of Mr. Street's valid claims breached the implied duty of good faith and fair dealing and operated to unreasonably deprive Mr. Street of the benefits of the Policies.

29. As a direct and proximate result of Cigna's breach of the covenant of good faith and fair dealing, Mr. Street suffered substantial damages.

Count 5: Bad Faith Denial of Insurance Claim

30. All preceding paragraphs are incorporated herein.

31. Cigna had no arguable basis in law or fact to deny and delay payment of Mr. Street's claims under the Policy or applicable law.

32. Cigna's denial and delay in payment of Mr. Street's claims through its refractory conduct in willfully and persistently requesting additional information, which had already been provided was intentional.

33. Cigna's denial and delay in payment of Mr. Street's claims reflects a reckless disregard for his rights and well-being.

34. Mr. Street suffered substantial damages as a direct and proximate result of Cigna's bad faith denial and delay in payment of his valid claims.

Count 6: Negligence, Gross Negligence, Reckless Disregard

35. All preceding paragraphs are incorporated herein.

36. Cigna owed Mr. Street the duty to reasonably, realistically, promptly and correctly investigate and adjust his claims and promptly pay covered claims or advise him of the basis for denial of a claim.

37. Cigna breached its duty to Mr. Street, A reasonable investigation of his claims would have shown that his claims were covered and that prompt payment to Mr. Street should be issued.

38. Cigna's failure to reasonably, realistically, promptly and correctly investigate and adjust Mr. Street's claims proximately caused his damages.

39. Mr. Street's damages were foreseeable to Cigna.

40. Cigna's conduct constitutes negligence, gross negligence and/or reckless disregard for Mr. Street's rights as an insured of Cigna.

Intentional Infliction or Emotional Distress

41. All preceding paragraphs are incorporated herein.

42. Cigna's conduct was intentional, was so extreme as to go beyond all possible bounds of decency in a civilized community, was shocking and completely unacceptable and was performed

in an outrageous manner and was wanton and willful so as to evoke outrage and revulsion.

43. Cigna's conduct was a substantial factor in causing Mr. Street severe mental and emotional distress.

44. Cigna's conduct was so outrageous it was foreseeable that the conduct would cause Mr. Street severe mental and emotional distress.

Negligent Infliction or Emotional Distress

45. All preceding paragraphs are incorporated herein.

46. Alternatively, Cigna's conduct was negligent and was something a reasonably careful person would not have done under the same or similar circumstances.

47. Cigna's conduct was a substantial factor in causing Mr. Street mental and emotional distress and it was foreseeable that the conduct would cause his mental and emotional distress.

Prayer for Relief

As a direct and proximate result of Cigna's negligence, gross negligence, reckless disregard for Mr. Street's rights as an insured under the Policy, breach of contract, breach of the duty of good faith and fair dealing, bad faith and tortious breach of contract without a legitimate or arguable reason in fact or law, David Street demands relief against Cigna, as follows:

a. Declaratory judgment that Cigna's attempt to impose new requirements for payment of benefits under the Policy violated its express terms and applicable law and was ineffective; the Policy remained in full force and effect through the date of Mr. Street's injury; and, Mr. Street is entitled to all rights, claims and benefits accruing under the Policy and applicable law;

b. All contract and extra-contractual damages available under the Policy and applicable law;

c. Incidental and consequential damages incurred as a result of Cigna's failure to fully,

properly and promptly adjust and pay valid claims;

- d. Compensatory damages for Cigna's tortious conduct;
- e. Extra-contractual damages for Cigna's denial of and delay in payment of Mr. Street's claims without any arguable basis in law or fact;
- f. Reasonable attorney fees and litigation expenses;
- g. Pre-judgment and post-judgment interest;
- h. Punitive damages for Cigna's denial of and delay in payment of Mr. Street's valid claims without any arguable basis in law or fact which rises to the level of an independent tort due to Cigna's willful, wanton, reckless, grossly negligent, and bad faith conduct;
- i. All damages available for Cigna's intentional and/or negligent infliction of emotional distress;

WHEREFORE, PREMISES CONSIDERED, Plaintiff demands judgment of and from Defendants, jointly and severally, in a sum exceeding the minimal jurisdictional levels of this Court for both actual and punitive damages and reasonable attorneys fees, together with all costs of this proceeding.

Respectfully submitted, this the 2nd day of January, 2019.

DAVID STREET

By:


PENNY B. LAWSON, MSB #103450

OF COUNSEL:

VARNER, PARKER & SESSUMS, P.A.
1110 Jackson Street
Vicksburg, Mississippi 39183
Telephone: 601.638.8741
Facsimile: 601.638.8666
Email: plawson@vpslaw.com



MISSISSIPPI INSURANCE DEPARTMENT

MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

501 N. WEST STREET, SUITE 1001
WOOLFOLK BUILDING
JACKSON, MISSISSIPPI 39201
www.mld.ms.gov

J. MARK HAIRE
Deputy Commissioner of Insurance

MAILING ADDRESS
Post Office Box 79
Jackson, Mississippi 39205-0079
TELEPHONE: (601) 359-3559
FAX: (601) 359-2474
WATS: 1-800-562-2857 (Incoming-USA)

January 28, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
91 7199 9991 7033 1682 2518

Life Insurance Company of NA
c/o CT Corporation System of MS
645 Lakeland East Drive, Ste 101
Flowood, MS 39232

91 7199 9991 7033 1682 2518

In Re: Case No. CI 2019-0026-JE, David Street vs. Cigna Group Insurance, Life Insurance Company of North America, Connecticut General Life Insurance Company and Cigna Life Insurance of New York, in the Circuit Court of Marion County, Mississippi

Dear Sir or Madam:

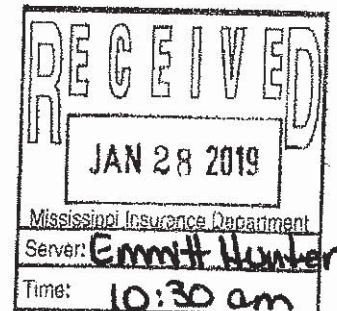
We enclose a copy of the Summons and Complaint in the above-styled cause which has been received in the Commissioner of Insurance's Office on January 28, 2019 at 10:30 a.m.

Respectfully,

MIKE CHANEY
COMMISSIONER OF INSURANCE

BY Christy Parker
Christy Parker
Assistant to Deputy Commissioner

MC/cp
Enclosures
Pc: Anita Wray
P.O. Box 1626
Canton, MS 39046



Receipt #896455
\$100.00 1/28/19
lc

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

DAVID STREET

VS.

PLAINTIFF

CAUSE NO.

02-2019-0026-JC

CIGNA GROUP INSURANCE,
LIFE INSURANCE COMPANY OF
NORTH AMERICA, CONNECTICUT
GENERAL LIFE INSURANCE COMPANY
AND CIGNA LIFE INSURANCE OF NEW YORK,
AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

TO: Mike Chaney, Commission of Insurance
Mississippi Insurance Department
1001 Woolfolk State Office Building
501 North West Street
Jackson, Mississippi 39201

NOTICE TO DEFENDANT

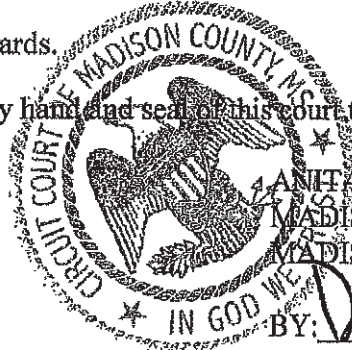
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You must also file the original of your response with the clerk of this court within a reasonable time afterwards.

Issued under my hand and seal of this court this the 25 day of JAN, 2019.



ANITA WRAY, CLERK
MADISON COUNTY CIRCUIT COURT
MADISON COUNTY, MISSISSIPPI
BY: [Signature] D.C.



Date Produced: 02/04/2019

MS Insurance Department:

The following is the delivery information for Certified Mail™ item number 7199 9991 7033 1682 2518. Our records indicate that this item was delivered on 01/30/2019 at 10:01 a.m. in FLOWOOD, MS 39232. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "Matthew".

Address of Recipient :

A handwritten address in black ink, appearing to read "645 E 1st".

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 0347547 10262293dco-life insur



MISSISSIPPI INSURANCE DEPARTMENT

MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

J. MARK HAIRE
Deputy Commissioner of Insurance

601 N. WEST STREET, SUITE 1001
WOOLFOLK BUILDING
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MAILING ADDRESS
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TELEPHONE: (601) 368-3589
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WATS: 1-800-562-2957 (Incoming-USA)

January 28, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
91 7199 9991 7033 1682 2501

Connecticut General Life Insurance Co
c/o CT Corporation System of MS
645 Lakeland East Drive, Ste 101
Flowood, MS 39232

91 7199 9991 7033 1682 2501

In Re: Case No. CI 2019-0026-JE, David Street vs. Cigna Group Insurance, Life Insurance Company of North America, Connecticut General Life Insurance Company and Cigna Life Insurance of New York, in the Circuit Court of Marion County, Mississippi

Dear Sir or Madam:

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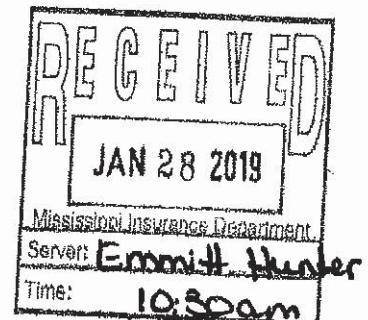
MIKE CHANEY
COMMISSIONER OF INSURANCE

BY

Christy Parker
Christy Parker

Assistant to Deputy Commissioner

MC/cp
Enclosures
Pc: Anita Wray
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Canton, MS 39046



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IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

DAVID STREET

VS.

PLAINTIFF

CAUSE NO. GT 2019-026-JE

CIGNA GROUP INSURANCE,
LIFE INSURANCE COMPANY OF
NORTH AMERICA, CONNECTICUT
GENERAL LIFE INSURANCE COMPANY
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AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

TO: Mike Chaney, Commission of Insurance
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ANITA WRAY, CLERK
MADISON COUNTY CIRCUIT COURT
MADISON COUNTY, MISSISSIPPI
BY: Daniel Blankenship D.C.



Date Produced: 02/04/2019

MS Insurance Department:

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Signature of Recipient :

A handwritten signature in black ink, appearing to read "M. J. Thim".

Address of Recipient :

A handwritten address in black ink, appearing to read "645 L 1 U".

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

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Customer Reference Number: 0347547 10262293dco-connecticu



MISSISSIPPI INSURANCE DEPARTMENT

MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

J. MARK HAIRE
Deputy Commissioner of Insurance

501 N. WEST STREET, SUITE 1001
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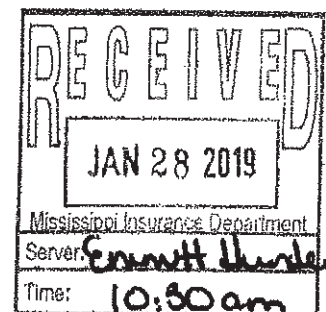
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IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

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PLAINTIFF

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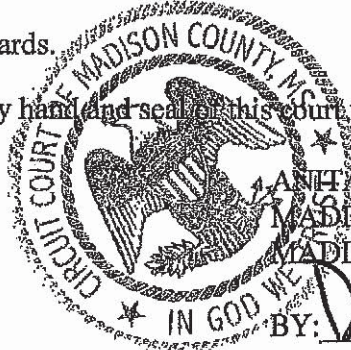
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ANITA WRAY, CLERK
MADISON COUNTY CIRCUIT COURT
MADISON COUNTY, MISSISSIPPI
BY: Daniel Blankenship D.C.

01-29-2019

Invoice Payment Receipt

Page 1 of 1

Invoice ID: 1565738

Name: VARNER, PARKER & SESSUMS, P.A.

EIN: 64-0860967

Payment Information:

Date Received: 01-29-2019

Amount Received: \$100.00

Payment Method: Cash

Payment Reference ID: 896455



Date Produced: 02/04/2019

MS Insurance Department:

The following is the delivery information for Certified Mail™ item number 7199 9991 7033 1682 2525. Our records indicate that this item was delivered on 01/30/2019 at 10:01 a.m. in FLOWOOD, MS 39232. The scanned image of the recipient information is provided below.

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Customer Reference Number: 0347547 10262293dco-cigna life



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MIKE CHANEY
Commissioner of Insurance
State Fire Marshal

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED
91 7199 9991 7033 1682 2495

Cigna Group Insurance
c/o CT Corporation System of MS
645 Lakeland East Drive, Ste 101
Flowood, MS 39232

91 7199 9991 7033 1682 2495

In Re: Case No. CI 2019-0026-JE, David Street vs. Cigna Group Insurance, Life Insurance Company of North America, Connecticut General Life Insurance Company and Cigna Life Insurance of New York, in the Circuit Court of Marion County, Mississippi

Dear Sir or Madam:

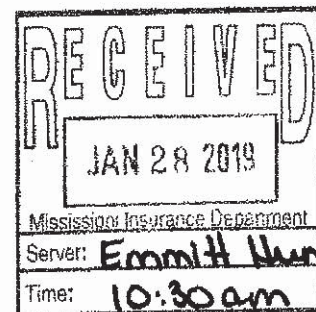
We enclose a copy of the Summons and Complaint in the above-styled cause which has been received in the Commissioner of Insurance's Office on January 28, 2019 at 10:30 a.m.

Respectfully,

MIKE CHANEY
COMMISSIONER OF INSURANCE

BY Christy Parker
Christy Parker
Assistant to Deputy Commissioner

MC/cp
Enclosures
Pc: Anita Wray
P.O. Box 1626
Canton, MS 39046



Recd: pl #896455
\$100.00 1/28/19
lc

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

DAVID STREET

VS.

PLAINTIFF

CAUSE NO. GT 2019-0026-JE

CIGNA GROUP INSURANCE,
LIFE INSURANCE COMPANY OF
NORTH AMERICA, CONNECTICUT
GENERAL LIFE INSURANCE COMPANY
AND CIGNA LIFE INSURANCE OF NEW YORK,
AND JOHN DOES 1-10

DEFENDANTS

SUMMONS

TO: Mike Chaney, Commission of Insurance
Mississippi Insurance Department
1001 Woolfolk State Office Building
501 North West Street
Jackson, Mississippi 39201

NOTICE TO DEFENDANT

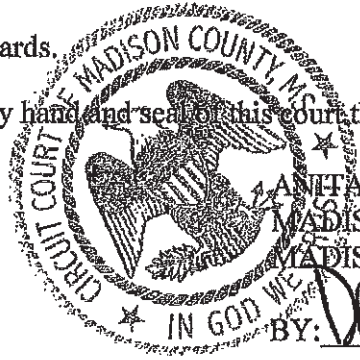
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT
AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to the following attorney for the Plaintiff: PENNY B. LAWSON, ESQUIRE, Varner, Parker & Sessums, P.A., 1110 Jackson Street, Vicksburg, Mississippi, 39183, (601) 638-8741.

Your response must be mailed or hand-delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a judgment of default will be entered against you for the money or other things demanded in the Complaint.

You must also file the original of your response with the clerk of this court within a reasonable time afterwards.

Issued under my hand and seal of this court this the 25 day of JAN, 2019.



ANITA WRAY, CLERK
MADISON COUNTY CIRCUIT COURT
MADISON COUNTY, MISSISSIPPI
BY: Daniel Blankenship D.C.



Date Produced: 02/04/2019

MS Insurance Department:

The following is the delivery information for Certified Mail™ item number 7199 9991 7033 1682 2495. Our records indicate that this item was delivered on 01/30/2019 at 10:01 a.m. in FLOWOOD, MS 39232. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "M. J. Thim".

Address of Recipient :

A handwritten address in black ink, appearing to read "645 L 1st".

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 0347547 10262293dco-cigna grou